

Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Charles D. Baker Governor

Karyn E. Polito Lieutenant Governor Matthew A. Beaton Secretary

Martin Suuberg Commissioner

March 3, 2016

Mr. David Hill Parker Hannifin Corporation – Chomerics Division 77 Dragon Court Woburn, Massachusetts 01888

Re: Final Approval of LPA for
Non-Fuel Emissions
at Parker Hannifin Corporation – Chomerics Division
77 Dragon Court

Woburn, Massachusetts 01888 Transmittal No: X268102 Appl. No. NE-15-016

Dear Mr. Hill:

The Metropolitan Boston/Northeast Regional Office of the Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Air and Waste, has determined that the referenced Limited Plan Application ("LPA") is administratively complete and in conformance with current air pollution control engineering practices. The MassDEP approves this LPA to restrict the facility-wide emission limits at your manufacturing facility located at 77 Dragon Court in Woburn, Massachusetts. (See attached Air Emissions Generating Equipment List.)

This LPA Approval is in accordance with 310 CMR 7.02(1), (3) and (4) of the Air Pollution Control Regulations ("Regulations"), 310 CMR 7.00, as adopted pursuant to M.G.L. c. 111, Sections 142A-142K.

Included as part of the LPA Approval are the following:

Stamped Approved **BWP AQ 01-B** Application Form; General Conditions for Non-Fuel Utilization Facility LPA's; Special Conditions; and Appeal Rights.

Please review the entire LPA Approval carefully as it stipulates the conditions with which the facility owner/operator must adhere for the facility to be constructed/reconstructed/altered and operated in compliance with the Regulations.

The MassDEP has determined that the filing of an Environmental Notification Form ("ENF") with the Secretary of Energy & Environmental Affairs, for air quality purposes, was not required prior to this action by the MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act and Regulation 301 CMR 11.00, section 11.04, provide certain "Fail-Safe Provisions" which allow the Secretary to require the filing of an ENF and/or Environmental Impact Report at a later time.

Should you have any questions concerning this Approval, please contact Mr. Mun Wong at (978) 694-3200 or at MassDEP, 205B Lowell Street, Wilmington, MA 01887.

Very truly yours,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead. This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Mun S. Wong Environmental Engineer Bureau of Air and Waste Susan P. Ruch Acting Permit Chief and Deputy Regional Director Bureau of Air and Waste

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cc: Board of Health, 10 Common Street, Woburn, MA 01801
 Fire Headquarters, 124 Main Street, Woburn, MA 01801
 DEP, Boston, Yi Tian (e-copy)
 M. Bolis, M. Persky, E. Braczyk, DEP, NERO

Attachment: BWP AQ 01-B LPA

GENERAL CONDITIONS FOR NON-FUEL EMISSION LPA'S

- 1. Operation No person shall operate a facility constructed, substantially reconstructed, or altered pursuant to 310 CMR 7.02(1), (3) and (4) except in conformance with the requirements established therein and in conformance with the specific written plan approval requirements.
- 2. Record keeping A recordkeeping system shall be established and continued on site. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination. Recordkeeping shall, at a minimum, include:
 - a) The initiation and completion dates for the proposed construction/reconstruction/alteration.
 - b) Maintenance. A record of routine maintenance activities including, at a minimum, a description of the maintenance performed and the date and time the work was completed.
 - c) Malfunctions. A record of all malfunctions including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions were initiated; and the date and time corrective actions were completed and the facility returned to compliance.
 - d) Records shall be maintained documenting the air contaminant emission analysis supporting the response to BWP AQ 01-B Section-C.
 - e) All records shall be kept on site for five (5) years from date of record and shall be made available to the MassDEP upon request.
- 3. Reporting Any construction, substantial reconstruction or alteration, as described in 310 CMR 7.02(1), (3) and (4), at a facility subject to the reporting requirements of 310 CMR 7.12, shall be reported to the MassDEP on the next required source registration.
- 4. The MassDEP may revoke, in accordance with 310 CMR 7.02(3)(k), any plan approval if the actual construction has not begun within two years from the date of issuance or if, during the construction, the construction is suspended for the period of one year or more.
- 5. Noise from the facility during construction, initial startup and routine operation, including startups and shutdowns, shall not exceed the MassDEP noise guidelines and shall not cause a condition of air pollution as defined in 310 CMR 7.01 and 7.10.
- 6. The Regional Bureau of Air and Waste office must be notified by telephone or fax as soon as possible after the occurrence of any upsets or malfunctions to the facility equipment, air pollution control equipment, or monitoring equipment which result in an excess emission to the air and a condition of air pollution.
- 7. The facility shall be constructed and operated in a manner to prevent the occurrence of dust or odor conditions which may cause or contribute to a condition of air pollution as defined in 310 CMR 7.01 and 7.09.
- 8. This Final Approval does not negate the responsibility of owner/ operator of the referenced facility to comply with this or any other applicable federal, state, or local regulations now or in the future.
- 9. This Approval may be suspended, modified, or revoked by the MassDEP if, at any time, the MassDEP determines that the facility is violating any condition or part of this LPA Approval. The MassDEP shall be notified in writing prior to any modification of the facility such as a change in raw materials or an increase in production capacity, which may increase emissions.

- 10. Should asbestos remediation/removal be required as a result of the approved construction/reconstruction/or alteration of this facility, such asbestos remediation/removal shall be done in accordance with Regulation 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- 11. The MassDEP must be notified in writing, when the subject equipments has been installed and has been deemed ready for continuous operation, within fourteen days (14) thereof.
- 12. Opacity, exclusive of uncombined water, shall not exceed 10% at all times during all modes of operation, including startups and shutdowns. Visible emissions or opacity, which exceed the limits set forth in this approval, shall be reported to the MassDEP in writing or by fax within seven (7) days of the occurrence.
- 13. Emission Testing The MassDEP may, in accordance with Regulation 310 CMR 7.13, require source emission testing ("stack testing"). All emission testing shall be conducted in accordance with the MassDEP's Guidelines for Source Emission Testing and with 310 CMR 7.13.
- 14. The facility shall be constructed and operated in strict accordance with the application approved herein. Should there be any differences between the aforementioned application and this approval letter, this approval letter shall govern.

SPECIAL CONDITIONS

- 1. Parker Hannifin Corporation Chomerics Division (Parker Hannifin) shall take immediate steps to abate any nuisance condition(s), including but not limited to visible emissions, noise, and odor, that maybe generated by the operation of the subject facility.
- 2. This Final Approval, NE-15-016, supersedes the Final Approval for MBR-10-IND-008 (Transmittal No. X232998) issued to you by MassDEP on October 7, 2010, the Final Approval for MBR-08-IND-002 (Transmittal No. W018385) issued to you by MassDEP on November 1, 2008 and the Final Approval for MBR-86-IND-079 issued to you by MassDEP on October 2, 1986, in their entirety, with the exception that all plan application materials submitted as part of the superseded plan approvals become part of this Plan Approval.
- 3. Parker Hannifin shall limit the VOC emission rates from the entire Woburn facility including the Premier Coating Line to less than 3.3 tons per month and to less than 9.9 tons per twelve month rolling calendar period.
- 4. Parker Hannifin shall limit the total hazardous air pollutants (HAPs) emission rates from the entire Woburn facility including the Premier Coating Line to less than 3.0 tons per month and to less than 9.0 tons per twelve month rolling calendar period.
- 5. Parker Hannifin shall limit the TPM emission rates from the entire Woburn facility including the Premier Coating Line to less than 0.8 ton per month and to less than 2.3 tons per twelve month rolling calendar period.

- 6. Parker Hannifin shall submit, in writing, an Exceedance Report to MassDEP should the facility exceed any limitation/restriction limit specified in Special Condition Nos. 3 5 of this Approval. Said Exceedance Report shall be submitted within seven (7) days of determination of the exceedance of the limitation/restriction. The Exceedance Report shall include identification, duration, and reason for the exceedance, and the remedial action plan to prevent future exceedances.
- 7. All VOC or HAPs containing materials, such as solvents, inks, and clean-up solutions, shall be transported and stored in tightly covered containers.
- 8. All cleaning rags used in conjunction with the cleaning solutions shall be placed in tightly covered containers when not in use, and shall be collected for proper recycling or disposal.
- 9. Parker Hannifin shall maintain adequate on-site records to document compliance with the emission caps as stated in Special Condition Nos. 3 6 above. Said records shall be made available to MassDEP personnel upon request, and shall be kept on site for a minimum of five (5) years. (See attached On-site Record-keeping Forms for the format which is acceptable to the MassDEP. An electronic version of this form in Microsoft Excel format can be obtained at http://www.mass.gov/dep/air/approvals/aqforms.htm#report.)
- 10. This Approval consists of the application materials and this Approval letter. If conflicting information is found between these two documents, then the requirements of the Approval letter shall take precedence over the documentation in the application materials.

APPEAL OF APPROVAL

This Approval is an action of the MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts Department of Environmental Protection P. O. Box 4062 Boston, MA 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city of town (or municipal agency) county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.